

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

J.G.,)
)
 Plaintiff,) Civil Action File
) No. 1:20-cv-05233-SEG
 v.)
)
 NORTHBROOK INDUSTRIES, INC.,)
 d/b/a UNITED INN AND SUITES,)
)
 Defendant.)

**DEFENDANT'S MOTION FOR LEAVE TO FILE
FRE 412 MOTION UNDER SEAL
AND MEMORANDUM OF LAW IN SUPPORT**

COMES NOW Defendant Northbrook Industries, Inc., d/b/a United Inn and Suites (“Northbrook”), and, pursuant to Rule 412(c)(2) of the Federal Rules of Evidence, files this motion for leave to file under seal Defendant’s FRE 412 Motion and Memorandum of Law in Support.

In support of this motion, Northbrook states that it intends to offer at the trial of this case certain evidence of Plaintiff’s other sexual behavior. Rule 412(c) of the Federal Rules of Evidence requires the filing of a motion before such evidence will be admitted. Although Northbrook does not concede that the evidence in this case is subject to Rule 412, Northbrook intends to file a Rule 412 motion out of an abundance of caution. Rule 412(c)(2) requires that such motion “must be and

remain sealed.” Accordingly, Northbrook seeks leave of Court to file its Rule 412 motion under seal. A proposed order granting the motion is provided.

L.R. 7.1(D) CERTIFICATION

The undersigned counsel hereby certifies that this Motion has been prepared in Times New Roman (14 point), which are font and point selections approved by the Court in L.R. 5.1(C).

Respectfully submitted,

/s/ Dana M. Richens
Dana M. Richens
Georgia Bar No. 604429
SMITH, GAMBRELL & RUSSELL, LLP
1105 W. Peachtree NE, Suite 1000
Atlanta, Georgia 30309
Telephone: (404) 815-3659
Facsimile: (404) 685-6959
drichens@sgrlaw.com

Attorney for Defendant
Northbrook Industries, Inc.
d/b/a United Inn and Suites

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served all parties with the within and foregoing **DEFENDANT'S MOTION FOR LEAVE TO FILE FRE 412 MOTION UNDER SEAL AND MEMORANDUM OF LAW IN SUPPORT** via the Court's CM/ECF electronic filing system, which will automatically provide notice of filing constituting service to all counsel of record.

This 14th day of March, 2025.

/s/ Dana M. Richens